## REMARKS

Claims 1 – 20 are now pending in the application. The amendments to the claims made herein are intended to more particularly point out and distinctly claim the subject matter regarded as the invention and thus are not narrowing amendments. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### REJECTION UNDER 35 U.S.C. § 102

Claims 1 – 20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Brotherston (WO 00/63806). This rejection is respectfully traversed.

It is first submitted that Brotherston appears to disclose a computer network utilizing means well known in the art for connecting various computer systems. For example, the connection between the handheld members and the cabin server of Brotherston is described as an RF Ethernet PCMCI connection. The present invention, on the other hand, discloses three distinct sub-networks on a mobile platform (e.g., an aircraft) with a means for isolating access to command-and-control systems. While these networks may utilize a connection type similar to the RF Ethernet PCMCI connection mentioned in Brotherston, they accomplish a feature neither contemplated nor made possible by Brotherston: the ability to isolate and secure the command-and-control systems from unauthorized parties with an isolation system. Amended claim 1 recites an "air-to-ground sub-network (AGN) providing Internet access to... passenger interfaces via at least one isolation system having corresponding logical [command-and-control network (CCN)] addresses and corresponding logical [passenger sub-network

(PSN)] addresses such that devices communicating on the AGN and the PSN are blocked from accessing the CCN addresses by the one isolation system." Claims 15 and 17 are similarly amended.

Additionally, the present invention solves one of the shortcomings inherent in the disclosure of Brotherston: the large routing tables required to allow for the possibility of hundreds of users accessing the same network, each user with a separate IP address. The present invention discloses a method for minimizing the size of these routing tables by utilizing a seat electronics box having a seat processor using an address resolution protocol. Amended claim 1 recites "a seat electronics box... defined as one of the passenger interfaces, the logical PSN address of the seat electronics box acting as a proxy address for devices coupled to the seat electronics box, the seat electronics box having a seat processor for translating PSN addresses into AGN addresses." Claims 15 and 17 are similarly amended.

It is therefore respectfully submitted that Brotherston does not anticipate the present invention, as it does not enable successful implementation of the improvement by one with ordinary skill in the art. Moreover, Brotherston does not render the present invention obvious. Additionally, claims 2 – 4, 7 – 14, 16, and 18 – 20 depend from claims 1, 15, and 17. Thus, it is believed that these claims are in condition for allowance for the reasons set forth above regarding claims 1, 15, and 17. In view of the foregoing amendments and remarks, reconsideration and withdrawal of the outstanding rejections is respectfully requested.

## CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: _May 10, 2005_

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